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5

6 **UNITED STATES BANKRUPTCY COURT**  
7 **NORTHERN DISTRICT OF CALIFORNIA**  
8 **SAN FRANCISCO DIVISION**

9  
10 **In re:**

11 **PG&E CORPORATION,**

12 **-and-**

13 **PACIFIC GAS & ELECTRIC**  
14 **COMPANY,**

15 **Debtors.**

Bankruptcy Case  
Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administered)

- 16 ☐ Affects PG&E Corporation  
17 ☐ Affects Pacific Gas and Electric  
Company  
18 ☒ Affects both Debtors  
19 \* *All papers shall be filed in the Lead Case,*  
20 *No. 19-30088 (DM).*

**APPLICATION FOR ADMISSION OF**  
**ATTORNEY KEITH J. CUNNINGHAM**  
***PRO HAC VICE***

21 Pursuant to B.L.R. 1001-2(a) and Civil Rule 11-3, Keith J. Cunningham, an active  
22 member in good standing of bar of the State of Maine, who is therefore a member in good  
23 standing of the bar of the highest court in that state, hereby applies for admission to practice  
24 in the United States Bankruptcy Court for the Northern District of California (the "**Court**")  
25 on a *pro hac vice* basis representing the following creditors and parties in interest in the  
26 above-captioned jointly administered bankruptcy cases (i) California Independent System  
27  
28

1 Operator Corporation (“CAISO”), and (ii) California Department of Water Resources, acting  
2 under the authority and powers created by California Water Code Sections 80000 through  
3 80270 (“CDWR”).  
4

5 In support of this application, I certify on oath that:

- 6 1. I am an active member in good standing of a United States Court or of the highest  
7 court of another State or the District of Columbia, as indicated above;  
8
- 9 2. I agree to abide by the Standards of Professional Conduct set forth in Local Rule  
10 11-4, and agree to become familiar with the Local Rules and the Bankruptcy  
11 Dispute Resolution Program of this Court; and
- 12 3. An attorney who is a member of the bar of this Court in good standing and who  
13 maintains an office within the State of California has been designated as co-  
14 counsel to CAISO in the above-entitled action. The name, address and telephone  
15 number of that attorney is: David L. Neale (SBN 141225), Levene, Neale,  
16 Bender, Yoo & Brill L.L.P., 10250 Constellation Blvd., Suite 1700, Los Angeles,  
17 CA 90067, Telephone: (310) 229-1234.  
18
- 19 4. An attorney who is a member of the bar of this Court in good standing and who  
20 maintains an office within the State of California has been designated as co-  
21 counsel to CDWR in the above-entitled action. The name, address and telephone  
22 number of that attorney is: Xavier Becerra, Attorney General of California,  
23 Martin Goyette, Senior Assistant Attorney General, Danette E. Valdez (SBN  
24 141780), Supervising Deputy Attorney General, 455 Golden Gate Avenue, Suite  
25 11000, San Francisco, CA 94102-7004, Telephone: (415) 510-3540.  
26  
27  
28

1 I declare under penalty of perjury that the foregoing is true and correct.

2 DATED: February 4, 2019

PIERCE ATWOOD LLP

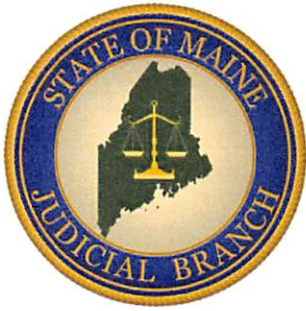
3  
4 By: 

Keith J. Cunningham

*Attorney for California Independent  
System Operator Corporation*

7 and

8  
9 *Attorney for California Department of  
Water Resources, acting under the authority  
10 and powers created by California Water  
11 Code Sections 80000 through 80270*



# STATE OF MAINE SUPREME JUDICIAL COURT

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## *Certificate of Good Standing*

*I, Matthew E. Pollack, Executive Clerk of the Supreme Judicial Court, hereby certify that Keith J. Cunningham, Esq. (Bar No. 008361) of Portland, Maine, was duly admitted as an Attorney and Counselor at Law in the State of Maine on October 17, 1996, and is presently registered and in good standing as an active member of the bar.*

*Given under my hand and the Seal of said Court on January 30, 2019.*



*Not valid without raised seal.*

A handwritten signature in blue ink, reading "Matthew E. Pollack", is written over a horizontal line.

Matthew E. Pollack  
Executive Clerk